

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

ANTHONY FRANCHI, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

NATIONSTAR MORTGAGE HOLDINGS  
INC., JAY BRAY, ROBERT GIDEL, ROY  
GUTHRIE, BRETT HAWKINS, MICHAEL  
D. MALONE, WMIH CORP., and WAND  
MERGER CORPORATION,

Defendants.

3:18-CV-01170-B (JJB)

**JOINT STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, plaintiff Anthony Franchi (“Plaintiff”) hereby voluntarily dismisses with prejudice all individual claims asserted in the above-captioned action (the “Action”) against Nationstar Mortgage Holdings, Inc.; Jay Bray; Robert Gidel; Roy Guthrie; Brett Hawkins; Michael D. Malone; WMIH Corp.; and Wand Merger Corporation (collectively, “Defendants”). Plaintiff further voluntarily dismisses without prejudice all claims asserted in the Action against the Defendants on behalf of the putative class. Defendants have served neither an answer nor a motion for summary judgment in the Action, and no class has been certified in the Action.

All parties jointly stipulate to the dismissal of the claims in this Action as set forth above. Pursuant to this stipulation, the parties have agreed, subject to the approval of the Court, that the Court shall retain jurisdiction over this Action for the sole and limited purpose of adjudicating any claim by counsel for Plaintiff for a mootness fee and expenses, if any, in connection with

claims previously alleged in the Action (“Fee Claim”), should there be a dispute over any such claim.

Nothing in this stipulation shall be construed to limit any right, position, claim, or defense of any party, including, without limitation, Defendants’ right to oppose any Fee Claim by counsel for Plaintiff on any basis whatsoever. If the parties reach an agreement concerning any Fee Claim, they shall notify the Court. Upon such notification, the Court shall close the Action.

Dated: Dallas, Texas  
August 7, 2018

/s/ Joe Kendall  
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Dated: Dallas, Texas  
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Dated: Dallas, Texas  
August 7, 2018

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*Attorneys for WMIH Corp. and Wand Merger  
Corporation*

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE